

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

RAMON ANTONIO MONTANEZ MARTINEZ
ZORAIDA ESQUILIN RODRIGUEZ

DEBTORS

CASE NO. 11-10531-BKT

CHAPTER 13

**MOTION REQUESTING ORDER OF APPROVAL
RE: DEBTORS' INTENTION TO PARTICIPATE IN A LOAN MODIFICATION
PROCESS THROUGH LOSS MITIGATION PROGRAM**

TO THE HONORABLE COURT:

NOW COME, RAMON ANTONIO MONTANEZ MARTINEZ and ZORAIDA ESQUILIN RODRIGUEZ, debtors, through the undersigned attorney, and very respectfully state and pray as follows:

1. On December 9, 2011, the debtors filed for protection under Chapter 13 of the Bankruptcy Code, 11 U.S.C. §§1301 et seq. The debtors scheduled as one of their assets a real property located at Ceiba Norte Ward Lot 106 Sector Santana I, Road 935, Km 19.6, Juncos, Puerto Rico. Said property has a lien with Oriental Bank.

2. Due to debtors' financial situation we are notifying this Honorable Court and all creditors of debtors' intention to participate in a loan modification process through a loss mitigation program with secured creditor Oriental Bank.

3. Furthermore, the debtors filed a post-confirmation modification of Chapter 13 Plan, dated March 31, 2014, to provide for the lift of the automatic stay in favor of Oriental Bank for the purpose of the loss mitigation modification. The mortgage arrears not already paid through the Plan will fall within the scope of the loan modification.

4. The debtors hereby respectfully submit to the Court that they need the approval of this Honorable Court to continue the loan modification process through the loss mitigation program with Oriental Bank. Once said modification is approved by the bank it will be submitted for evaluation to the Trustee in this case and to this Honorable Court for its approval.

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Debtors' Intention to Participate in Loss Mitigation Program
Case no. 11-10531-BKT

WHEREFORE it is respectfully requested from this Honorable Court that an approval Order upon debtors' intention to modify their mortgage loan through loss mitigation program be entered, in the above captioned case.

NOTICE

Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, the US Trustee's Office, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular US mail to the debtors, Ramon Antonio Montanez Martinez and Zoraida Esquilin Rodriguez, to their address of record: HC 03 Box 7157, Juncos PR 00777; and to all creditors and interested parties, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 31th day of March, 2014.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR PETITIONERS
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
Email: rfigueroa@rfclawpr.com